

UNITED STATES DISTRICT COURT

for the
Central District of California

In the Matter of the Search of)
(Briefly describe the property to be searched)
or identify the person by name and address)) Case No. 2:24-MJ-01628
USPS Priority Mail parcel bearing tracking number 9505)
5128 5821 4066 0834 06)
)

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Central District of California
(identify the person or describe the property to be searched and give its location):

See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):
See Attachment B

YOU ARE COMMANDED to execute this warrant on or before April 4, 2024 (not to exceed 14 days)
☒ in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to _____
(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

☐ for _____ days (not to exceed 30) ☐ until, the facts justifying, the later specific date of _____.

Date and time issued: _____

Judge's signature

City and state: _____

Hon. Alicia G. Rosenberg, U.S. Magistrate Judge

Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

Return

Case No.:

2:24-MJ-01628

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

*Executing officer's signature*_____
Printed name and title

ATTACHMENT A

PARCEL TO BE SEARCHED

The following United States Postal Service ("USPS") parcel seized from the mail stream on March 13, 2024, which currently in the custody of the United States Postal Inspection Service in City of Industry, California (the "SUBJECT PARCEL"):

a. A USPS Priority Mail parcel bearing tracking number 9505 5128 5821 4066 0834 06. The SUBJECT PARCEL is a white colored, medium-sized USPS Flat Rate Box. The SUBJECT PARCEL is addressed to "JESSICA RAMIREZ, 2767 MAPLE, VINELAND, NJ 08361." The return address listed on the SUBJECT PARCEL is "LATIMEX, 11742 CENTRAL AVE, CHINO, CA 91710." The SUBJECT PARCEL was postmarked on March 6, 2024, in the 90703 zip code.

ATTACHMENT B

ITEMS TO BE SEIZED

The items to be seized are evidence, contraband, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject Offenses"), namely:

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Parcel wrappings, and any associated packaging material.

AFFIDAVIT

I, Zachary Sumpter, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of an application for a warrant to search a United States Postal Service ("USPS") Priority Mail parcel bearing tracking number 9505 5128 5821 4066 0834 06 (the "SUBJECT PARCEL") currently in the custody of the United States Postal Inspection Service ("USPIS") in City of Industry, California, within the Central District of California, as described more fully in Attachment A:

2. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "Subject Offenses"), as described more fully in Attachment B.

3. Attachments A and B are incorporated by reference herein.

4. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does

not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. TRAINING AND EXPERIENCE

5. I am a Task Force Officer ("TFO") with USPIS and have been so since November 2021. I am currently assigned as a TFO to the Contraband Interdiction and Investigations South Team of the Los Angeles Division, which is responsible for investigating drug trafficking involving the United States Mail. Accordingly, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. Prior to being assigned as a TFO with the USPIS, I worked patrol as a full-time sworn law enforcement officer with the Chino Police Department. I have been a sworn law enforcement officer since August 2013. I am a Police Officer within the meaning of California Penal Code § 830.1.

6. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws. I have been involved in various electronic surveillance methods including state and federal wiretap investigations, the debriefing of informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and

importation of controlled substances, and the laundering of drug proceeds. I have participated in many aspects of drug investigations, including investigations into the smuggling of illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. I am familiar with how drug traffickers use counter-surveillance techniques to avoid detection by law enforcement.

III. SUMMARY OF PROBABLE CAUSE

7. On March 13, 2024, I was alerted to the SUBJECT PARCEL while at City of Industry Processing and Distribution Center in Los Angeles County, California. While examining the SUBJECT PARCEL, it met certain criteria common to packages containing contraband, including that it was excessively taped, had handwritten address information, lacked a business account number, and, according to law enforcement databases, contained a recipient's name that was not associated with the respective listed addresses.

8. On March 18, 2024, a trained drug detection dog alerted to the SUBJECT PARCEL for the presence of drugs or other items, such as the proceeds of drug sales that have been contaminated by drugs.

IV. STATEMENT OF PROBABLE CAUSE

A. Background on Use of Mails for Drug Trafficking

9. Based on my training and experience as a TFO, and the experiences related to me by Postal Inspectors who specialize in drug investigations, I know the following:

a. Los Angeles is a significant source area for controlled substances. Controlled substances are frequently transported from the Los Angeles area via U.S. Mail, and the proceeds from the sale of controlled substances are frequently returned to the Los Angeles area via U.S. Mail. These proceeds are generally in the form of money orders, bank checks, or similar monetary instruments in an amount over \$1,000. Based on my training and experience, I know that proceeds from the sale of controlled substances often contain the odor of drugs because they have been contaminated by or associated with the odor of one or more drugs.

b. Drug distributors often use USPS Priority Mail Express, which is the USPS overnight/next day delivery mail product, or Priority Mail Service, which is the USPS two-to-three-day delivery mail product. Drug distributors use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the parcel's progress to delivery. Drug distributors use the Priority Mail delivery service because it provides them more time for travel between states if they decide to follow their shipments to their destination for distribution. Also, by adding delivery confirmation to a Priority Mail parcel, drug traffickers are

able to track the parcel's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail 2-Day Service.

10. The following indicia suggest that a parcel may contain drugs or drug distribution proceeds:

- a. The parcel is contained in a Large Flat Rate cardboard box;
- b. The parcel bears a handwritten label, whether USPS Express Mail or Priority Mail;
- c. The handwritten label on the parcel does not contain a business account number;
- d. The seams of the parcel are all taped or glued shut;
- e. The parcel emits an odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and
- f. Multiple parcels are mailed by the same individual, on the same day, from different locations.

11. Parcels exhibiting such indicia may be subject to further investigation, which may include verification of the addressee and return addresses.

12. I know from my training and experience that drug traffickers often use fictitious or incomplete names and addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases. To the extent that real addresses are ever used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

B. Initial Investigation of the SUBJECT PARCEL

13. On March 13, 2024, while at the City of Industry Processing and Distribution Center, I intercepted the SUBJECT PARCEL because it met some of the initial suspicious characteristics as described above. Specifically, I determined the following:

a. The SUBJECT PARCEL is a USPS Priority Mail parcel and in a white colored, medium-sized USPS Flat Rate Box. The SUBJECT PARCEL has copious amounts of clear tape on its seams, has handwritten address information, and does not contain a business account number. According to CLEAR¹ database records, the return address listed on the SUBJECT PARCEL ("11742 CENTRAL AVE, CHINO, CA 91710") appears to be a legitimate address and is associated with the listed business name, "LATIMEX." However, the recipient address listed on the SUBJECT PARCEL ("2767 MAPLE, VINELAND, NJ 08361") appears to be a legitimate address but is not associated with the listed recipient, "JESSICA RAMIREZ."

C. Drug-Detection Dog Alerts to the SUBJECT PARCEL

14. On March 18, 2024, based on the suspicious characteristics of the SUBJECT PARCEL, El Monte Police Department Officer Adam Girgle had his trained drug detection dog, "Rico," examine the exterior of the SUBJECT PARCEL. I learned from Officer Girgle that Rico gave a positive alert to the SUBJECT PARCEL, indicating the presence of controlled substances or other items, such as the proceeds of controlled

¹ CLEAR is a public information database used by law enforcement that provides names, addresses, telephone numbers, and other identifying information.

substances, which have been recently contaminated with the odor of controlled substances. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, are documents setting forth information provided by Officer Girgle regarding Rico's training and history in detecting controlled substances, and the examination of the SUBJECT PARCEL.

V. CONCLUSION

15. For the reasons above, there is probable cause to believe that the SUBJECT PARCEL, as described in Attachment A, contains evidence, fruits, and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance), as described in Attachment B.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this ____ day of
March 2024.

HONORABLE ALICIA G. ROSENBERG
UNITED STATES MAGISTRATE JUDGE